Ramon Rossi Lopez rlopez@lopezmchugh.com (California Bar Number 86361; admitted p Lopez McHugh LLP 100 Bayview Circle, Suite 5600 Newport Beach, California 92660 949-812-5771  Mark S. O'Connor (011029) moconnor@beusgilbert.com Beus Gilbert, PLLC 701 N. 44 <sup>th</sup> Street Phoenix, Arizona 85008 602-429-3019  Co-Lead/Liaison Counsel for Plaintiffs	ro hac vice)
UNITED STATES DISTRICT COURT	
In Re Bard IVC Filters Products Liability Litigation	No. MD-15-02641-PHX-DGC
	PLAITNIFF'S NOTICE OF LODGING PLAITNIFF'S SEPARATE STATEMENT OF FACTS
	(Assigned to the Honorable David G. Campbell)
	(Tinlin Bellwether Case)
Separate Statement of Facts and exhibits the As required under LRCiv 5.6(d), parties met and conferred in good faith documents are confidential under the Prote	ffs submit this Notice of Lodging Plaintiff's sereto.  Plaintiffs certify that on March 1, 2019, the and were unable to agree about whether the ective Order and should be filed under seal. This agreed to continue to meet and confer on the
	rlopez@lopezmchugh.com (California Bar Number 86361; admitted p Lopez McHugh LLP 100 Bayview Circle, Suite 5600 Newport Beach, California 92660 949-812-5771  Mark S. O'Connor (011029) moconnor@beusgilbert.com Beus Gilbert, PLLC 701 N. 44 <sup>th</sup> Street Phoenix, Arizona 85008 602-429-3019  Co-Lead/Liaison Counsel for Plaintiffs  UNITED STATE  DISTRICT  In Re Bard IVC Filters Products Liability Litigation  Pursuant to LRCiv 5.6(d), Plainti Separate Statement of Facts and exhibits th As required under LRCiv 5.6(d), parties met and conferred in good faith documents are confidential under the Prote dispute notwithstanding, the parties have

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1	RESPECTFULLY SUBMITTED this 1st day of March, 2019.	
2	BEUS GILBERT, PLLC	
3	By: /s/ Mark S. O'Connor	
4	Mark S. O'Connor 701 N. 44 <sup>th</sup> Street	
5	Phoenix, Arizona 85008	
6	LOPEZ McHUGH LLP	
7	Ramon Rossi Lopez (CA Bar No. 86361) (admitted <i>pro hac vice</i> ) 100 Bayview Circle, Suite 5600 Newport Beach, California 92660	
8	100 Bayview Circle, Suite 5600 Newport Beach, California 92660	
9	Co-Lead/Liaison Counsel for Plaintiffs	
10	Co-Leau/Liaison Counsei for Fiaintiffs	
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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of March 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine

- 3 -